

## UNITED STATES DISTRICT COURT

NOV 02 2015

for the

Southern District of Texas

David J. Bradley, Clerk  
Laredo Division

United States of America

v.

Christopher James Minnick

Case No.

S:15mjl602

AFTD  
B 75K13  
PE 11.13.15  
10AM.

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 30, 2015 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

18 USC 111

## Offense Description

The defendant did knowingly and unlawfully impede an immigration inspection at a designated United States Border Patrol Checkpoint by failing to respond to questions asked during an immigration inspection. Furthermore, the defendant did knowingly and unlawfully impede an immigration inspection when the defendant failed to move their vehicle from the primary inspection zone to the secondary inspection zone.

This criminal complaint is based on these facts:

See Attachment A.

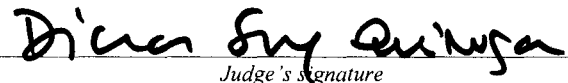
☒ Continued on the attached sheet.

Complainant's signature

Joseph Spielman/ICE HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: November 2, 2015

Judge's signature

City and state: Laredo, Texas

U.S. Magistrate Judge Diana Song Quiroga

Printed name and title

## **Attachment A**

I, Joseph Spielman, a Special Agent with Homeland Security Investigations, have knowledge of the following facts:

1. On October 30, 2015, U.S. Border Patrol Agent (BPA) Nicholas Hyde was assigned to the primary vehicle inspection lane at Interstate Highway 35 Border Patrol Checkpoint located at mile marker 29 north of Laredo, Texas. At approximately 6:45 pm, an orange tractor trailer driven by Christopher James MINNICK arrived at the Border Patrol Checkpoint vehicle primary lane for inspection.
2. BPA Hyde greeted MINNICK and asked MINNICK if there was anyone traveling with MINNICK. MINNICK responded by saying that he (MINNICK) was unwilling to answer any of BPA Hyde's questions. BPA Hyde asked MINNICK if he (MINNICK) was a United States Citizen, to which MINNICK replied that he (MINNICK) did not want to answer BPA Hyde's questions. BPA Hyde then instructed MINNICK to park his (MINNICK) tractor trailer in the secondary parking area. MINNICK told BPA Hyde that he (MINNICK) would not move his tractor trailer from its position.
3. BPA Hyde used his service issued radio to contact his supervisor, Supervisory Border Patrol Agent (SBPA) Edwin Lozano. SBPA Lozano approached MINNICK and the conversation between SBPA Lozano and MINNICK was recorded on a Go Pro camera belonging to the U.S. Border Patrol. During the conversation, SBPA Lozano asked MINNICK if he (MINNICK) was a United States Citizen, and MINNICK responded that he (MINNICK) would not answer any of SBPA Lozano's questions. SBPA Lozano then asked MINNICK to move his (MINNICK) tractor trailer to the secondary parking area, and MINNICK responded that he (MINNICK) would not move the tractor trailer. After MINNICK refused to comply with the request to move the vehicle, MINNICK was removed from the trailer.
4. On October 30, 2015, at approximately 9:35 pm, Homeland Security Investigations (HSI) Special Agent Joseph Spielman and HSI Special Agent Rodolfo Vega read MINNICK his Miranda Rights in the English Language. MINNICK stated that he understood his rights. At that time, MINNICK requested a lawyer. No further questions were asked.
5. On October 30, 2015, MINNICK was placed under arrest and charged with the violation of 18 USC 111. MINNICK was transported to the Webb County Jail, Laredo TX to await judicial proceedings.